1 2	GARY L. MYERS, ESQ. Nevada Bar No. 3120 LAW OFFICE OF GARY L. MYERS 7251 W. Lake Mead Blvd., Suite 300 Las Vegas, Nevada 89128-8359 Telephone: 702.240.1980 Facsimile: 702.240.1981 Attorney for Defendant IGNACIO FLORES GARCIA	
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6	UNITED STATES DISTRICT COURT	
7	DISTRICT OF NEVADA	
8	UNITED STATES OF AMERICA,	
9	Plaintiff,))) Case No.: 2:09-cr-00302-GMN-PAL
10	vs.) Case No.: 2:09-cr-00302-GMN-PAL
11	JUAN CARLOS MACIAS-CHAVEZ, aka Juan Carlos Munguia	MOTION TO EXTEND SURRENDER DATE, PERMIT TRAVEL OUTSIDE THE
12	JOSE ROSALLES, aka Don Pancho,	JURISDICTION AND TEMPORARILY PROVIDE DEFENDANT WITH HIS
13	IGNACIO FLORES GARCIA,	PASSPORT
14	Defendants.	
15	Defendant IGNACIO FLORES-GARCIA by and through his attorney, Gary L.	
16	Myers, Esq., hereby presents the following Motion to Extend Surrender Date,	
17	Permit Travel Outside the Jurisdiction and Temporarily Provide Defendant With	
18	His Passport. This Motion is made and based upon the accompanying	
19	memorandum of points and authorities, the pleadings and papers on file herein	
20	and such argument and evidence as may be presented at the hearing on this	
21	Motion, should any occur.	
22	Dated: July 14, 2011	LAW OFFICE OF GARY L. MYERS
23	By://s//	
24		GARY L. MYERS, ESQ., #3120 7251 W. Lake Mead Blvd., Suite 300
25		Las Vegas, Nevada 89128-8359 Attorney for Defendant
26	IGNACIO FLORES GARCIA	
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MEMORANDUM OF POINTS AND AUTHORITIES

Defendant IGNACIO FLORES-GARCIA was sentenced by this Court on June 23, 2011 to 48 months' incarceration with a surrender date of September 26, 2011. The primary purpose of this motion is to allow Mr. Flores-Garcia to travel to Mexico, specifically to the United States Consulate in Juarez, as part of obtaining an immigrant visa for his son, Ruben German Garcia Castaneda. Ruben is 19½ years old and is Ignacio's son with his first wife, who resides in Ignacio has begun the process of obtaining an immigrant visa for Mexico. Ruben, having submitted the necessary forms and very recently paying a \$400 fee to the National Visa Center. (See Exhibit A.) The next step in this process is for Ignacio (if permitted by the Court) along with Ruben to present at the United States Consulate in Juarez for an immigrant visa interview. This interview has not yet been scheduled but based upon past experience, Mr. Flores-Garcia expects that he will be notified within about six weeks when that interview will occur. To the best of the undersigned's knowledge, Mr. Flores-Garcia is the only person that can perform this task (attending the interview) with Ruben, since he is both Ruben's father and a United States citizen. Furthermore, there is a relatively limited amount of time within which to perform this task since all necessary steps must be completed before Ruben turns 21. The undersigned's understanding further is that once Ruben turns 21 the opportunity to obtain an immigrant visa with his father's assistance or sponsorship will be lost or greatly delayed. Therefore, this task must be accomplished before Ignacio's surrender date or the opportunity will be lost. The plan or arrangement that has been discussed with Ruben is that if he obtains his immigrant visa he will come to Las Vegas and live with Ignacio's wife and daughter while Ignacio's is incarcerated and assist the family and provide financial support during his (Ignacio's) incarceration. This may well make what could be a very difficult financial situation for the family (during Ignacio's incarceration) much easier.

As the Court may recall, Ignacio undertook a trip to Juarez (permitted by Stipulation and Order, document 96) in September of 2010 with his adopted daughter, Stephanie Carrillo-Sanchez, for her immigrant visa interview. Mr. Flores-Garcia and Ruben may be able to complete the visa interview process prior to the surrender date, but respectfully requests a 60-day extension on his surrender date in order to be sure there is ample time. The \$400 payment must be processed by the National Visa Center, and thereafter it will notify Ignacio by mail concerning the time frame for presenting at the U.S. Consulate. As noted above, based upon his past experience (with his daughter), Ignacio estimates that it will be about six weeks until he hears from the National Visa Center re the scheduling of the interview.

Incidentally, Mr. Flores-Garcia forgot to discuss the matter which is the

Incidentally, Mr. Flores-Garcia forgot to discuss the matter which is the subject of this motion with the undersigned prior to his sentencing, or this matter would have been addressed with the Court at the sentencing hearing.

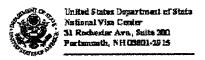
Finally, Mr. Flores-Garcia respectfully requests that Pretrial Services temporarily provide him with his passport to permit this travel to and from Mexico. Ignacio will promptly surrender the passport to Pretrial Services after his return to the jurisdiction and also will comply with any conditions that Pretrial Services or the Court may see fit to impose during his trip.

Dated: July 14, 2011

LAW OFFICE OF GARY L. MYERS

By: //s//
GARY L. MYERS, ESQ., #3120
7251 W. Lake Mead Blvd., Suite 300
Las Vegas, Nevada 89128-8359
Attorney for Defendant

IGNACIO FLORES GARCIA



IGNACIO GARCIA 2417 SHADY HILL AVENUE LAS VEGAS, NV 89106

CHECKLIST

June 10, 2011

NVC Case Number: CDJ2005798477

Dear IGNACIO GARCIA:

We have reviewed the documents which you submitted in support of an application for an immigrant visa. Please review the information listed under each applicant's name and provide any documents which are indicated as missing or need additional information. You must submit the required information. Failure to provide the requested information will delay your immigrant visa interview.

Please read the enclosed information to determine where to send all required copies of missing documents. If you have any questions regarding this letter, please call the National Visa Center at (603) 334-0700 between the hours of 7:30am and midnight ET.

Please include a copy of this letter with your correspondence and write your case number clearly (exactly as it appears below) on the upper right-hand corner of all documents.

From the date you mail or transmit the requested information, please allow 20 business days for NVC to review this documentation/your mail. When we complete our review, the NVC will notify you/petitioner/beneficiary/attorney with information regarding the next processing step.

If a period of one year passes without contacting the NVC (by e-mail, telephone, or mail), all submitted fees and documents will expire. Upon expiration, the fees and documents would need to be resubmitted in order to continue the immigration process.

Case Number:

CDJ2005798477

Beneficiary's Name:

GARCIA CASTANEDA, RUBEN GERMAN

Preference Category:

IR2 - CHILD OF U.S. CITIZEN

Priority Date:

26APR2001